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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civ. Action No. 19-cv-8655 (LGS)(GWG)

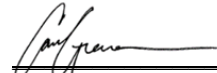
**PLAINTIFF'S MOTION FOR LEAVE TO FILE SUPPLEMENT PLEADINGS**

Pursuant to Rule 15(d) of the Federal Rules of Civil Procedure, Plaintiff, by and through her undersigned counsel, moves this Court for leave to file the Proposed Supplemental Complaint, Exhibit 1, to include supplemental retaliation claims arising from factual events that occurred after the filing of Plaintiff's Amended Complaint, ECF No. 12. The Proposed Supplemental Complaint is attached as Exhibit 1. Pursuant to Your Honor's Individual Practice Rule 2, Plaintiff has conferred with Defendant, and Defendant does not consent to this motion.

The grounds for this Motion are set forth in the Plaintiff's Memorandum in Support of Plaintiff's Motion for Leave to Supplement Pleadings, ECF No. 77.

Dated: New York, New York  
December 15, 2020

Respectfully submitted,

  
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Cara E. Greene

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2020, I filed the foregoing document using the Court's CM/ECF filing system, which will automatically send e-mail notification of such filing to the following individuals of record:

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*Attorneys for Defendant*

/s/ Cara E. Greene  
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